

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

**IN RE: BPS DIRECT, LLC and  
CABELA’S, LLC, WIRETAPPING**

---

**MDL NO. 3074  
2:23-md-03074-MAK**

---

**DEFENDANTS’ UNOPPOSED MOTION FOR THE  
PRO HAC VICE ADMISSION OF MAVERIC RAY SEARLE**

Erin (Loucks) Leffler, counsel for Defendants BPS Direct, LLC and Cabela’s, LLC in Case No. 2:23-md-03074-MAK, and a member in good standing before this Court, hereby moves for the admission and appearance in this case of co-counsel, Maveric Ray Searle, *Pro Hac Vice*.

Mr. Searle is a member in good standing before the following courts:

1. State of Illinois (Admitted 2021 – IL Bar No. 6336731)
2. Northern District of Illinois (Admitted 2021)
3. Southern District of Illinois (Admitted 2021)
4. Western District of Wisconsin (Admitted 2023)

In addition, Mr. Searle is of good moral character and professional reputation. An affidavit of Mr. Searle in support hereof is filed herewith.

Defendants require the special admission of Mr. Searle because of Mr. Searle’s understanding of the legal and factual issues present in this case. Mr. Searle has been heavily involved with Defendants’ development of their defense to date, including by drafting a significant portion of Defendants’ briefs in support of their Motion to Dismiss Plaintiffs’ Consolidated Class Action Complaint. ECF Nos. 54-1, 57.

The undersigned affirms her ongoing obligations and responsibilities in this Action, including those set forth in Section I.K of Judge Kearney’s Policies.

The undersigned has conferred with counsel for Plaintiffs and there is no opposition to this Motion.

October 24, 2023

Respectfully Submitted,

By: /s/ Erin L. Leffler  
Erin (Loucks) Leffler (PA ID No. 204507)  
Shook, Hardy & Bacon L.L.P.  
Two Commerce Square  
2001 Market St., Suite 3000  
Philadelphia, PA 19103  
Phone: (215) 278-2555  
Fax: (215) 278-2594  
eleffler@shb.com

Jennifer A. McLoone (admitted *pro hac vice*)  
Shook, Hardy & Bacon L.L.P.  
201 South Biscayne Boulevard  
Suite 3200  
Miami, FL 33131-4332  
Phone: (305) 358-5171  
Fax: (305) 358-7470  
jmcloone@shb.com

***Counsel for Defendants***